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10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

12
13 In re:

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC**
17 **COMPANY,**

18 **Debtors.**

19 ☒ Affects Pacific Gas and Electric Company

20
21
22 ** All papers shall be filed in the Lead Case,*
23 *No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF JENNIFER L.
DODGE IN SUPPORT OF
REORGANIZED DEBTOR PACIFIC
GAS AND ELECTRIC COMPANY'S
MOTION IN LIMINE NO. 1 TO
EXCLUDE CLAIMANT TODD
GREENBERG'S EXHIBIT QQ (DENNIS
WEBB ESTIMATE) AND TESTIMONY
OF WITNESS DENNIS WEBB AT
TRIAL OF CLAIM NO. 77335 (TODD
GREENBERG)**

24 Trial: June 27, 2022
25 Time: 9:00 a.m. (Pacific Time)
26 Place: (Via Zoom Videoconference)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

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2 I, Jennifer L. Dodge, pursuant to Section 1746 of Title 28 of the United States Code,
3 hereby declare under penalty of perjury that the following is true and correct to the best of my
4 knowledge, information, and belief:
5

6 1. I am the owner and president of Law Offices of Jennifer L. Dodge Inc. and serve
7 as legal counsel for Pacific Gas and Electric Company (the “Utility”), as debtor and reorganized
8 debtor (“PG&E” or “Reorganized Debtor”) in the above-captioned Chapter 11 cases (the
9 “Chapter 11 Cases”), with regard to Proof of Claim number 77335 (the “Claim”) filed by Todd
10 Greenberg (“Greenberg” or “Claimant”). I have been a member of the California State Bar
11 Association since 1998 and am admitted to practice in the Northern District of California. I
12 submit this Declaration in support of *Reorganized Debtor Pacific Gas and Electric Company’s*
13 *Motion in Limine No. 1 to Exclude Claimant Todd Greenberg’s Exhibit QQ (Dennis Webb*
14 *Estimate) and Testimony of Witness Dennis Webb at Trial of Claim Number 77335 (Todd*
15 *Greenberg)*, filed contemporaneously herewith.

16 2. Except as otherwise indicated herein, all facts set forth in this Declaration are
17 based upon my personal knowledge and my review of relevant documents and information. If
18 called upon to testify, I would testify competently to the facts set forth in this Declaration. I am
19 authorized to submit this declaration on behalf of the Reorganized Debtors.

20 3. In accordance with the Scheduling Order regarding Pre-Trial Objections and
21 Motions in Limine, I certify that I have complied in good faith with the meet and confer
22 requirements set forth therein and have met and conferred with counsel for Greenberg prior to
23 filing this Motion in Limine.

24 4. On June 6, 2022, three weeks before trial and nearly three weeks past the May 20,
25 2022 discovery cutoff, I received an email from Richard Lapping, counsel for Todd Greenberg in
26 this matter, attaching a new estimate of \$82,937.45 for the replacement of laminate flooring from
27 Dennis Webb Construction. A true and correct copy of the email and attachment I received is
28 attached hereto as Exhibit A.

5. Mr. Lapping and I agreed to extend the May 20, 2022 discovery deadline to allow Mr. Lapping to take the deposition of PG&E Manager Dustin Dear on May 24, 2022. A true and correct copy of the email confirming this extension is attached hereto as Exhibit B. No other extensions were requested or agreed to.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. Executed this 21st day of June, 2022.

Jennifer L. Dodge